

ORIGINAL



EX PARTE OR LATE FILED

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August 4, 1998

Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION

Re: CC Docket No. 96-115 - Telecommunications Carriers' Use of Customer
Proprietary Network Information (CPNI); Ex Parte

Dear Ms. Salas:

Enclosed is a submission to supplement the record in the above referenced docket to support the July 20 ex parte letter from numerous associations seeking an interim stay of the electronic CPNI safeguards. This information was hand-delivered to Brent Olson and Carol Matthey in the Common Carrier Bureau.

Please do not hesitate to call if there should be any questions.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Riley".

Pamela J. Riley

cc: Ms. Carol Matthey
Mr. Brent Olson

Ms. Riley's rec'd 023
11/13/98

Overview

AirTouch urges the Commission to adopt an interim stay of the electronic safeguard requirements pending reconsideration of the substantive CPNI rules.

CMRS carriers such as AirTouch have no existing IT capabilities to monitor CPNI access

The mechanized CPNI safeguards impose significant problems for AirTouch in terms of time available to comply, dollar cost, scarce programming resources, and IT system impacts

AirTouch Cellular estimates a cost of more than \$10 million and at least 12 months to comply

The substantial legal, economic, and policy arguments raised in the numerous Petitions for Reconsideration support the limited relief sought

Current 1/26/99 deadline poses severe challenge to the industry, particularly in light of concurrent Year 2000 efforts

Alternative means of ensuring CPNI compliance must be evaluated

Reconsideration of the rules should permit flexibility with regard to electronic audit procedures as well as “first screen” flagging requirements

Impacts of CPNI electronic safeguards

AirTouch has more than one dozen separate IT systems impacted across dispersed markets in 19 states

Evolutionary growth of company through partnerships and acquisitions has resulted in multiple systems for billing, sales support and marketing, customer care

Each system requires separate teams and separate processes for CPNI compliance

AirTouch's customer service systems are highly customized, designed to provide speedy access to the precise information necessary to respond to queries

The "first" screen of a customer's service record may be one of **thirty-five** different initial screens, depending upon the customer's inquiry

That is, different requests bring up different system applications or fields of information such as current billing information, historic billing information, new services to be added, alternative rate plans available, coverage area issues, technical information about a particular phone, account changes, use of new features, etc.

"Customer-centric" systems design provides many benefits

Chance of errors is reduced because customer service reps cannot inadvertently change account information; each screen pulled up is limited, designed for a specific function

Speed of response is greatly enhanced by limiting number of screens which must be scrolled or applications which must be opened

Upgrading a single customer's account to ensure CPNI-approval information is visible is a time-consuming, multi-faceted requirement

AirTouch Cellular markets total more than 8,000,000 U.S. customers today

Resource Issues

CPNI provisions require experienced software engineers and programmers to install changes

Proprietary nature of AirTouch systems necessitates that only personnel familiar with the current programs can install changes accurately and efficiently

Total person hours for AirTouch compliance estimated to be 80,000 including software design, development, testing and implementation

Systems modifications are underway based upon a host of other requirements

Year 2000 compliance

E 911 compliance

Number portability

Wiretap functionality

Authentication

Operational integrity and excellence are at risk with so many simultaneous software system changes

Scheduling the required CPNI changes competes directly with mission-critical Year 2000 project

Even if skilled people were available, system changes must be done serially, not concurrently

Cost and Timing Issues

Detailed business case identifying complete cost of compliance still in development

Initial AirTouch Cellular cost estimate is \$8-10 million dollars to make system changes

Estimate does not include significant other costs to the business

Training of 2500+ customer service reps on the system changes and rules

Additional customer care representatives to maintain efficient response times
(due to additional steps on customer records)

Possible hardware upgrades to track and store when a customer record is opened, by whom, for what purpose, and be accessible to audit

Current schedule anticipates the following time is needed to comply with new rules

Complete review of current information process procedures	1 month
Detailed design and plan of system changes	2 months
Software development and modifications	3 months
Implementation and testing of system modifications	4 months
Customer service level testing	1 month
Live customer service systems use	<u>1 month</u>
	12 months